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Attorneys for Defendant CLARE E. CONNORS, in her Official Capacity as the Attorney General of the State of Hawaii

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF HAWAII

TODD YUKUTAKE and DAVID KIKUKAWA,

Plaintiffs,

VS.

CLARE E. CONNORS, in her Official Capacity as the Attorney General of the State of Hawaii and the CITY and COUNTY OF HONOLULU,

Defendants.

CIVIL NO. 19-00578 JMS-RT

DEFENDANT CLARE E. CONNORS, IN HER OFFICIAL CAPACITY AS THE ATTORNEY GENERAL OF THE STATE OF HAWAII'S RESPONSE TO PLAINTIFFS' FIRST SET OF REQUEST FOR ADMISSIONS TO DEFENDANT CLARE E. CONNORS

Trial Date: January 12, 2021

## DEFENDANT'S RESPONSES TO PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS TO DEFENDANT CLARE E. CONNORS

1. Please admit that the State of Hawaii does not require specific business hours for the City and County of Honolulu's Firearms Permit Unit.

Defendant objects to this request because it assumes that the State of Hawaii has jurisdiction or authority over the City and County of Honolulu with regard to its policies, procedures, rules and laws relating to its Firearms Permit Unit.

2. Please admit that there is no governmental interest in requiring an applicant for a permit to acquire to return to the Honolulu Police Department to pick up a permit to acquire.

Defendant denies this request.

3. Please admit that Hawaii can contact Federal Firearms Licensees (FFLs) by electronic mail.

Defendant objects to this request as vague and ambiguous and assumes facts that have not been established and calls for speculation.

4. Please admit that Hawaii state law does not require in-person handgun registration after purchase of a handgun.

Defendant denies this request.

5. Please admit that Hawaii state law does not forbid the City and County of Honolulu from transmitting an issued handgun permit to acquire by electronic mail.

Defendant objects to this request because it assumes that the State of Hawaii has jurisdiction or authority over the City and County of Honolulu with regard to its policies, procedures, rules, and laws relating to its Firearms Permit Unit.

6. Please admit that the current Hawaii state law invalidates a permit to acquire a handgun after ten days from date of issue, not six.

Defendant denies this request.